

	General Requirements	
Page & Line #s	Question	Comments
Page 13, Lines 274-276	GR 01 - Is a written Leafy Greens Compliance Plan which specifically addresses the LGMA metrics available for review?	
	GR 02 - Does it specifically address the following subjects consistent with the LGMA metrics:	
	GR 02a - Water	
	GR 02b - Soil Amendments	
	GR 02c - Environmental Factors	
	GR 02d - Worker Practices	
	GR 02e - Field Sanitation	
Page 13, Lines 277-278	GR 03 - Is an up-to-date growers list with contact and location information available for review?	
Daga 42 Lines 270 204	GR 04 - Is the handler in compliance with the registration requirement of The Public Health Security and Bioterrorism	
Page 13, Lines 279-281	Preparedness and Response Act of 2002?	
	GR 05 - Does the Handler have a traceability process?	
	GR 05a - Does it enable identification of immediate non-transporter source?	
	GR 05b - Does it enable identification of immediate non-transporter subsequent recipient?	
Page 13, Lines 282-284	GR 06 - Has the Handler (or if applicable, the grower) designated someone to implement and oversee the food safety program	?
	GR 06a - Is the name of the individual available?	
	GR 06b - Is 24/7 contact information for the individual available?	

	Environmental Assesments	
Page & Line #s	Question	Comments
Pre-Season Assessment		
Page 12, lines 319-322	Animal Activity	
Page 14, Lines 300-302	EA -1 - Did the assessment indicate that the production area was free from evidence of animal intrusion?	
1 age 14, Lines 500-502	If EA -1 is answered "NO" then EA 001 - EA 003d will drop down.	
	EA 001 - Was the animal hazard or potential risk of intrusion assessed by a Food Safety Professional?	
	EA 002 - Was the animal hazard or potential risk of intrusion assessed as a "Low Hazard"?	
	EA 002a - If "YES," were corrective actions carried out according to company SOP?	
Page 46, Table 5	EA 003 - Was the animal hazard or potential risk of intrusion assessed as a "Medium/High Hazard"?	
	EA 003a - If "YES," were corrective actions formulated?	
	EA 003b - If "YES," were corrective actions carried out per the LGMA requirements?	
	EA 003c - If "YES," is documentation available to show that actions were implemented??	
	EA 003d - If "YES," are you periodically monitoring the effectiveness of any corrective actions?	



Environmental Assesments (continued)	
age & Line #s	Question
Page 13, Line 326 - 335	Adjacent Land Use
Page 48, Table 6	EA 02 - Was the adjacent land area free from compost operations within 400' of the crop edge? EA 02a - If "No," are there mitigation measures, topographical or climate features that indicate that the 400' recommendation should be modified? EA 02b - If "No," are mitigation measures in place and documented?
	EA 03 - Was the adjacent land area free from confined animal feeding operations (CAFO) within 400' of the crop edge?
Page 48, Table 6	EA 03a - If "No," are there mitigation measures, topographical or climate features that indicate that the 400' recommendation should be modified? EA 03b - If "No," are mitigation measures in place and documented?
	EA 04 - Is the adjacent land area free from non-synthetic soil amendments stored within 400' of the edge of the crop?
Pages 48-49, Table 6	EA 04a - If "No," has the non-synthetic crop treatment been treated using a validated process and no closer than 30' from the edge of the crop? EA 04b - If "No," are there mitigation measures or topographical features that indicate that the 400' recommendation should be modified? EA 04c - If "No," are mitigation measures in place and documented?
Page 49, Table 6	EA 05 - Is the adjacent land area free from grazing lands/domestic animals within 30' from the edge of the crop? EA 05a - If "No," are there topographical or climate features that indicate that the 30' recommendation should be modified? EA 05b - If "No," are mitigation measures in place and documented?
	EA 06 - Is the adjacent land area free from any septic leach fields (home or other building) within 30' of the edge of the crop?
Page 49, Table 6	EA 06a - If "No," are there mitigation measures, topographical or climate features that indicate that the 30' recommendation should be modified or is too short a distance? EA 06b - If "No," are mitigation measures in place and documented?
	EA 07 - Are all well heads at least 200' from untreated manure?
Page 49, Table 6	EA 07a - If "No," are there topographical or climate features that indicate that 200' is too short a distance? EA 07b - If "No," are mitigation measures in place and documented?
	EA 08 - Does documentation justify the buffer zone distance for all surface water sources on the ranch and their separation from untreated manure (raw manure and partially composted manure) as follows?
Page 50, Table 6	EA 08a - 100' for sandy soil with a slope <6% EA 08b - 200' for loamy or clay soil with a slope <6% EA 08c - 300' for all slopes >6%
	EA 09 - Is the adjacent land free from uses or conditions that pose a food safety risk to crops?
Page 44, Lines 968-970	EA 09 - Is the adjacent tand free from uses or conditions that pose a food safety risk to crops? EA 09a - If "No," has a risk assessment been conducted to evaluate the risk? EA 09b - If "No," have corrective measures been put in place and documented?



	Environmental Assesments (continued)	
Page & Line #s	Question	Comments
Page 14, Lines 305-317	Recent Field History	
	EA 10 - Are production blocks free from all of the following:	
Page 14, Lines 315-317	EA 10a - History of flooding within the last 60 days	
Page 14, Lines 305-307	EA 10b - History of grazing on the crop land within the last 1 year	
Page 14, Lines 308-310	EA 10c - History of hazardous activity including but not limited to CAFO, municipal waste, toxic waste, landfill, etc?	
	EA10a - EA10c if any of these are answered "NO" then EA10d will drop down	
	EA 10d - If "NO," were specific actions implemented and documented to mitigate the issue(s)?	
Page 14, Lines 321-324	Soil Fertility	
	EA 11- Does the handler harvest/process spinach?	
Pre-Harvest Assessment		
Page 13, Lines 293-317;	EA 12 - Was a Pre-Harvest Assessment conducted within 7 days for each harvested lot? EA 12a - Did it address the following areas? EA 12b - Intrusion by animals EA 12c - Flooding	
Page 42, Lines 887-889; Page 46, Table 5	EA 12d - Potential contamination materials EA 12d - Potential contamination materials EA 12e - Condition of water source and distribution system EA 12f - Unexpected adjacent land activity that poses a risk to food safety EA 12g - Worker hygiene and sanitary facilities	
Animal Intrusion	27172g Trontor nygrono and odninary radiinado	
	EA 13 - Did the assessment indicate that the production area was free from evidence of animal intrusion? If EA 13 is answered "NO" then EA 13a - EA 13f will drop down.	
Page 46, Table 5	EA 13a - Was the animal hazard or potential risk of intrusion assessed by a food safety professional or food safety personnel? EA 13b - Was the animal hazard or potential risk of intrusion assessed as a "Low Hazard"? EA 13c - If "YES," were corrective actions carried out according to company SOP? EA 13d - Was the animal hazard or potential risk of intrusion assessed as a "Medium/High Hazard"?	
	EA 13e - If "YES," were corrective actions carried out per the LGMA requirements? EA 13f - If "YES," is documentation available to show that actions were implemented?	



	Environmental Assesments (continued)	
Page & Line #s	Question	Comm
Jnusual Events		
Page 14, Lines 315-317	EA 14 - Does the pre-season ranch assessment include an evaluation of potential flooding and a conclusion that there is insignficant potential for flooding of the production blocks?	
	If EA14 is answered "NO" then EA13a - EA13e will drop down	
	EA 14a - If "No," do the records indicate that no fields were flooded at any time during the crop cycle?	
	EA 14b - If production blocks were flooded, is there documentation to indicate the extent of flooding and the area of crop impacted?	
	EA 14c - Was the product left unharvested?	
	EA 14d - If product was harvested, was a 30' (min) "no harvest" buffer from the high water mark established?	
	EA 14e - Are these remedial activities documented?	
Page 14, Lines 308-310	EA 15 - Is the pre-harvest lot free from all evidence of any other type of potential source of human pathogen contamination, AND has the food safety status of the adjacent land remained unchanged since the pre-season assessment was conducted?	
	If EA 15 is answered "NO" then EA 15a - EA 15h will drop down	
	EA 15a - If "No," was a food safety assessment completed?	
	EA 15b - Is the individual who conducted the assessment identified?	
	EA 15c - Is the date of the assessment documented?	
	EA 15d - Were remedial actions formulated?	
	EA 15e - If "No," was the field harvested?	
	EA 15f - If "No," is there documentation to show the remedial actions were followed?	
Page 43, Lines 928-931	EA 15g - Did the remedial action include creation of "no harvest" buffer or separation zones around the potentially contaminated area(s)?	
Page 47, Table 5	EA 15h - Is documentation which fully delineates the potential contamination available for review?	

	Water Use	
Page & Line #s	Question	Comments
	WU 01 - Is a ranch map (or other documentation) indicating the sources of water and distribution systems available for review?	
Page 14, Lines 339-345	Lines 339-345 WU 01a - Does the map (or other documentation) identify permanent above ground fixtures such that they can be located in the field?	
Page 14, Lines 339-345	WU 01b - Does the map or other documentation identify the production blocks that may be served by each water source?	
Page 15, Lines 351-353	WU 01c - Was a sanitary survey completed prior to the use of each water source?	
Page 15, Line 346-347	WU 01d - Are effluent systems (that convey untreated human or animal wastes) separated from irrgation water systems?	



	Water Use (continued)	
Page & Line #s	Question	Comm
Pre-Harvest Foliar and	non-Foliar Water Applications	
	Table 1 & Figure 1A & 1B	
	WU 02 - Was a source water test conducted for each source of water within 60 days of first use on post germinated fields?	
Page 17, Table 1	WU 02a - Are records available to demonstrate that water samples have been collected from each water distribution system on a monthly basis (N/A if a system has qualified for an exemption)?	
	WU 02b - Do records show that the water samples were taken no less than 18 hours apart?	
Page 18, Table 1	WU 02c - Is the geometric mean less than or equal to 126 MPN/100 ml?	
rage 10, Table 1	WU 02d - Are all individual samples less than or equal to 235MPN/100 ml (foliar) or 576 MPN/100m ml (non-Foliar)?	
	WU 02e - Do records show the location where the sample was taken?	
	WU 02f - Do records show the name of the test laboratory?	
	WU 02g - Is the generic E.coli testing methodology specified on the test report, and does it meet the 15 tube MPN (FDA BAM) or other U.S. EPA, AOAC, or other method accredited for quantitative monitoring of water for generic E. coli?	
	If WU02c or WU02d answered "NO" then WU02h-WU02p will drop down	
	WU 02h - Was the water system discontinued after tests indicated that the water source failed to meet the minimum water quality requirements?	
	WU 02i - Was a sanitary survey completed on the water source and distribution system for possible contamination?	
Page 17, Table 1	WU 02j - Do records show that corrective actions were taken to eliminate the contamination sources?	
	WU 02k - Were samples for the required water retesting taken at the previous sampling point?	
	WU 02I - Was one water test was taken daily (not less than 18 hours apart) for 5 days?	
	WU 02m - Did these 5 test results met the acceptance criteria: average less than 126 MPN/100ml (based on rolling geometric mean=5) and no sample exceeded greater than 235 MPN/100 ml (foliar) or 576 MPN/100 ml (non-foliar)? WU 02n - Do records show that the water system was not used while the water quality was inadequate?	
	WU 020 - Was product sampled for E coli 157:H7 and Salmonella? OR	
	WU 02p - Do records show that the crop was not harvested for human consumption when the water tests were positive for E coli O157:H7 or Salmonella?	
Municpal Supply or We	Il Exemption	
	WU 03 - Is the source water from a municipal supply or well?	
Page 17, Table 1	WU 03a - Does this source qualify for the 5 consecutive monthly samples below the generic E. coli detection limit on record (2.2 MPN) exemption?	
	WU 03b - Is the last sample recorded within 180 days of the audit date?	



Water Use (continued)		
Page & Line #s	Question	Comments
Post Harvest- Direct Pro	oduce Contact or Food Contact Surfaces	
	Table 1 & Figure 1C	
Page 18, Table 1	WU 04 - Is the water from a source that meets the USEPA MCLG for microbial quality (Negative per 100ml (<2.2 MPN/100ml))?	
	WU 04a - If "No," has the water received sufficient disinfection to meet the USEPA MCLG for microbial quality?	
Page 19, Table 1	WU 04b - If the water is reused, is sufficient disinfectant added and monitored to prevent possible cross-contamination? (Chlorine-more than 1ppm free chlorine and PH 6.5-7.5 or ORP-more than 650mV or other approved treatment per product EPA label for human pathogen reduction in water)	
	WU 04c - Was a source water test conducted for each source of water within 60 days of first use?	
	WU 04d - Are records available to demonstrate that water samples or monitoring results have been collected from each water distribution system within the last month?	
	If WU04 and WU04a are answered "NO" then WU04e - WU04n will drop down	
	WU 04e - Was use of the water system discontinued after the tests indicated the water source failed to meet the minimum water quality requirements?	
	WU 04f - Was a sanitary survey completed on the water source and distribution system for possible contamination?	
	WU 04g - Do records show that corrective actions were taken to eliminate the contamination sources?	
Page 18, Table 1	WU 04h - Were samples for the required water retesting taken at the previous sampling point?	
	WU 04i - Was one water test taken daily (not less than 18 hours apart) for 5 days at the point closest to use?	
	WU 04j - Did these 5 test results meet the acceptance criteria: less than 2.2 MPN/100ml?	
	WU 04k - Do records show that the water system was not used while the water quality was inadequate?	
	WU 04I - Was product sampled for E coli 157:H7 and Salmonella?	
	WU 04m - Do records show that the crop was not harvested for human consumption when tests were positive for E coli O157:H7 or Salmonella?	
	WU 04n - Do the records show that the product was not harvested?	



	Water Use (continued)	
Page & Line #s	Question	Comments
Page 18, Table 1	WU 05 - Do records show that all water used in equipment cleaning processes (Tables, belts, bins, etc.) was tested for generic E. coli or that sufficient disinfectant was used?	
Page 19, Table 1	WU 05a - Do the records document all of the following: WU 05b - The generic E.coli testing methodology is specified on the test report and meets the 15 tube MPN (FDA BAM) or other U.S. EPA, AOAC, or other method accredited for quantitative monitoring of water for generic E. coli. WU 05c - The records indicate that the operation monitors disinfectant levels during re-hydration, product coring in the field, and product cooling. WU 05d - The records indicate the testing procedure/equipment that was used for monitoring the disinfectant levels [Indicate the procedure/equipment type.]	
	WU 05e - Records indicate the location where the sample was taken. WU 05f - Records show the name of the test laboratory (if applicable).	

	Soil Amendments	
Page & Line #s	Question	Comments
All soil amendments are	free from raw or partially composted animal manure and biosolids.	
Page 23; Lines 490-492	SA 01 - Raw or partially composted animal manure or biosolids have not been applied in the last 1 year?	
1 age 25, Lines 450-452	SA 01a - If "No" to the above, were any of these fields used in the production of leafy greens?	
Soil amendments contair	n composted manure	
	SA 02 - No soil amendment containing fully composted animal manure has been applied to the field within the last year?	
Page 24, Lines 526-536	If SA02 is answered "NO" then SA02a-SA02u will drop down	
1 age 24, Lilles 020-000	SA 02a - Are Process Validation records available for review?	
	SA 02b - If the Enclosed or Within-Vessel Composting method is used, do the records show:	
	SA 02cthat the active compost maintained a minimum of 131oF for 3 days?	
	SA 02d - If the Windrow Composting method is used do the records show:	
	SA 02ethat the active compost maintained aerobic conditions for a minimum of 131°F or higher for 15 days or longer?	
D 0500 T 11 0	SA 02fa minimum of five turnings?	
Pages 25-26, Table 2	SA 02g - If the Aerated Static Pile Composting method is used do the records show that:	
	SA 02hthe active compost was covered with 6 to 12 inches of insulating materials?	
	SA 02imaintain a minimum of 131oF for 3 days?	
	SA 02j - Has each lot of composted material that is equal to or less than 5000 cubic yards been tested as required?	
	SA 02k - Has each lot of composted material been applied to the production location more than 45 days before harvest?	
	Records must be available to document that the following criteria have been meet for each utilized lot of compost containing	
	animal material.	
	a. Acceptance criteria	
Pages 25-26, Table 2	SA 02I - Fecal coliforms: <1000 MPN/gram	
<u> </u>	SA 02m - Salmonella: Negative per sample size of the prescribed test	
	SA 02n - E. coli O157:H7: Negative per sample size of the prescribed test	



	Audit Checklist
Soil Amendments (continued)	
Page & Line #s	Question
Soil amendments contai	n composted manure
	b. Recommended test methods
	SA 020 - Fecal coliforms: 9 tube MPN
Pages 25-26, Table 2	SA 02p - Salmonella spp: U.S. EPA Method 1682
	SA 02q - E. coli O157:H7: Any laboratory validated method for compost
	SA 02r - Other U.S. EPA, FDA, or AOAC-accredited methods may be used as appropriate.
	c. Sampling plan
	SA 02s - A composite sample is representative and random and obtained as described in the California state regulations
Pages 25-26, Table 2	SA 02t - Sample may be taken by the supplier if trained by any testing laboratory or state authority
	SA 02u - Laboratory must be certified/accredited
Page 23, Lines 497-507	SA 03 - Is a Letter of Guarantee or other comparable documentation (ingredient statement, bag label, etc) available that shows
	that the soil amendment does not contain animal manure or is composed of a single ingredient?
Page 26, Table 2	SA 03a - Is the name of the authority issuing the Letter of Guarantee or other comparable document shown?
oil amendments that co	ontain animal manure that are physically heat treated or processed by other equivalent methods
	SA 04 - No soil amendment containing animal manure that has been physically heat treated or processed by other equivalent methods has been applied in the field within the last year?
	If SA04 is answered "NO" then SA04a-SA04m will drop down
	SA 04a - Are process records or other comparable documentation available that show the lethality of the process?
Pages 27-28, Table 2	SA 04b - Is the name of the process authority issuing the Letter of Guarantee or other comparable document shown?
	Records must be available to document that the following criteria have been meet for each utilized lot of physically heat
	treated (or processed by other equivalent method) compost containing animal material.
	a. Acceptance criteria
Pages 27-28, Table 2	SA 04c - Fecal coliforms: Negative MPN/gram
	SA 04d - Salmonella: Negative per sample size of the prescribed test
	SA 04e - E. coli O157:H7: Negative per sample size of the prescribed test
	b. Recommended test methods
	SA 04f - Fecal coliforms: 9 tube MPN
Pages 27-28, Table 2	SA 04g - Salmonella spp: U.S. EPA Method 1682
	SA 04h - E. coli O157:H7: Any laboratory validated method for compost
	SA 04i - Other U.S. EPA, FDA, or AOAC-accredited methods may be used as appropriate.
	c. Sampling plan
Pages 27-28, Table 2	SA 04j - Take at least 12 equivolume samples from 12 or more separate locations or 12 samples from 12 individual bags, if bagged
. 5	SA 04k - Sample may be taken by the supplier if trained by any testing laboratory or state authority
	SA 04I - Laboratory must be certified/accredited



	Soil Amendments (continued)	
Page & Line #s	Question	Comments
Pages 27-28, Table 2	SA 04m - If testing records are NOT available, is a Certificate of Process Validity as defined by the "Guidelines" available for review?	
Soil amendments that ar	re Non-Synthetic Crop Treatments (compost teas, fish emulsions, fish meal, blood meal, bio-fertilizers, etc) Table 3 & Figure 3).	
Page 31; Line 581-589	SA 05 - No non-synthetic crop treatment has been applied to the crop?	
	If SA05 if answered "NO" then SA05a - SA05v will drop down	
	SA 05a - If "No" to the above, the product (non-synthetic soil amendment) was not applied to the edible portion of the crop?	
Pages 32-33, Table 3	SA 05b - Is a letter of compliance or comparable document outlining the actual conditions of use and conformance to standards available for review (including presence of animal products or manure)?	
	Records must be available to document that the following criteria have been meet for each lot of non-synthetic crop treatment	
	used. SA 05c - Did each lot/batch used meet the microbial criteria identified below?	
	SA 05d - Salmonella: Negative per sample size of the prescribed test	
Pages 32-33, Table 3	SA 05e - E. coli O157:H7: Negative per sample size of the prescribed test	
	SA 05f - If this treatment is applied as a liquid, does the solution meet the microbial criteria set forth for pre-harvest water application? (5-sample geometric mean of 126 MPN/100 ml and no sample >235 MPN/100ml (Foliar) or 576 MPN/100 ml (nonfoliar))	
	Application intervals were met:	
	SA 05g - Was this non-synthetic crop treatment produced using a validated process for pathogen control?	
Pages 32-33, Table 3	SA 05h - If "No" to above, was the treatment applied at least 45 days before harvest?	
. .	SA 05i - If "Yes", are process validation records and documentation available to show that the process is capable of reducing pathogens of human health significance to acceptable levels.	
	Acceptable testing methods were followed:	
	SA 05j - Salmonella spp: U.S. E.P.A. Method 1682	
Pages 32-33, Table 3	SA 05k - E. coli O157:H7: Any laboratory validated method for compost sampling	
	SA 05I - Other U.S. EPA, FDA, or AOAC-accredited methods may be used as appropriate.	
	The proper sampling plan was followed:	
	SA 05m - Solid: 12 point sampling plan composite sample	
Pages 32-33,Table 3	SA 05n - Liquid: Single well-mixed sample per lot	
rages 32-33, rable 3	SA 05o - Sample may be taken by the supplier if trained by the testing laboratory	
	SA 05p - Laboratory must be certified/accredited by annual review of laboratory protocols based on GLPs by recognized NGO.	
	Testing Frequency	
Pages 32-33, Table 3	SA 05q - Test each lot before application to production fields. Records should:	
	SA 05r - Identify the crop treatment.	
	SA 05s- Show the name of the laboratory completing the testing.	
	SA 05t - Show date of application.	
	SA 05u - Show the date of harvest SA 05v - Show the supplier name.	



	Worker Practices	
Page & Line #s	Question	Comments
General Requirements		
Page 37; Lines 737-742	WP 01 - Is there a written policy for all employees and all visitors to the field location which describes the required hygiene rules?	
	WP 01a - Does the Policy address the following:	
Page 38, Lines 766-781	WP 01b - Sanitary Facilities	
Page 37; Lines 743-751	WP 01c - Field Worker Practices (GMP's, GHP's, etc.)	
Page 37; Lines 758-765	WP 01d - Worker Health Practices	
Sanitary Facilities		
	WP 02 - Is there a documented field sanitary facility program?	
	WP 02a - Does the Field Sanitary Facility Program address the following:	
	WP 02b - The number, condition, and placement of field sanitation units complies with applicable state and/or federal regulations.	
	WP 02c - Are sanitary facilities readily accessible (proximate) to the work area.	
	WP 02d - Are sanitary facilities are regularly maintained according to schedule.	
	WP 02e - Do sanitary facilities have sufficient consumable supplies (i.e.: hand soap, water, paper towels, toilet paper, etc).	
Page 38; Lines 766-781	WP 02f - Are readily understandable signs are posted to instruct employees to wash their hands before beginning or returning to work.	
	WP 02g - Are field sanitation facilities cleaned and serviced on a scheduled basis, and at a location that minimizes the risk of product contamination?	
	WP 02h - Does the field sanitary facility program address the placement of the sanitary facility in order to minimize any impact on the	
	crop in the field including: WP 02i - Minimizing the impact on the crop from leaks and/or spills	
	WP 02i - Minimizing the impact on the crop norm leaks and/or spills WP 02j - The ability to access the unit for service	
	WP 02k - A documented response plan in the event of a major leak and/or spill.	
Field Worker Practices		
	WP 03 - Is there a written worker practices program?	
	WP 03a - Does the program establish employee work rules which address the following:	
Page 37, Lines 758-765	WP 03h - Training on proper sanitation and hygiene practices?	
	WP 03c - The requirement that workers wash their hands before beginning or returning to work?	
	WP 03d - Confining smoking, eating and drinking (except water) to designated areas?	
	WP 03e - Storage requirements for personal items in or adjacent to the field?	
Page 37; Lines 754-755	WP 03f - The appropriate use and sanitation of gloves?	
Page 35; Line 665-666	WP 03g - Proper cleaning, sanitation and storage of hand harvest equipment (knives, scythes, etc)?	



Worker Practices (continued)		
Page & Line #s	Question	Comn
	WP 03h - For materials targeted for further processing, is there a written physical hazard prevention program which includes the following?	
	WP 03i - The proper wearing of head and facial hair restraints.	
Pages 37, Lines 752-757	WP 03j - The proper wearing of apron and other food safety apparel.	
	WP 03k - Removal of visible jewelry (rings, bracelets, necklaces, body piercings, etc.) prior to the start of work.	
	WP 03I - Removal of all objects from upper pockets.	
Worker Health Practices		
Page 37, Lines 758-765	WP 04 - Is there a written worker health practices program?	
	WP 04a - Are employee work rules established which address the following:	
Page 37, Lines 758-765	WP 04b - Workers with diarrheal disease or symptoms of other infectious disease are prohibited from handling fresh produce.	
	WP 04c - Workers with open cuts or lesions are prohibited from handling fresh produce.	
	WP 04d - Actions for employee to take in the event of injury or illness.	
	WP 04e - A policy describing procedures for disposal/handling of produce or food contact surfaces that have come into contact with blood or other body fluids.	

Field Sanitation		
Page & Line #s	Question	Comments
General Requirements		
Page 37, Lines 739-742	FS 01 - Is there a written policy for all employees and all visitors in the field location which describes the required field sanitation SOPs?	
Field Activities		
	FS 02 - Does the written field activity SOP address the following:	
Page 38, Lines 792-795	FS 02a - Cross contamination by farming equipment that comes into contact with raw manure, untreated compost, waters of unknown quality, animals hazards or other potential sources.	
	FS 02b - If "yes", does it appropriately restrict the use or require a documented cleaning and sanitation program of the equipment?	
	FS 02c - If cleaning and sanitation are required, are records of the cleaning/sanitation available for review.	
Harvest Activities		
	FS 03 - Does the written harvest activity SOP address the following:	
Page 37, Line 743-744	FS 03a - Is a specific individual assigned the food safety responsibility for harvesting?	
	FS 03b - Is a documented daily food safety harvest assessment available for review?	
	FS 03c - Is the assessment dated?	
	FS 03d - Is the individual who conducted the assessment identified?	



	Field Sanitation (continued)	
Page & Line #s	Question	Comments
	FS 03e - Are the specific growing blocks associated with the assessment clearly identified?	
	FS 03f - Is the Harvester name and contact information documented?	
	FS 03g - Did the assessment indicate that the production are was free from evidence of animal intrusion?	
	If FS 03g is anaswered "NO" then FS 03gg 0 FS 03i2 will drop down	
	FS 03gg - Was the animal hazard or potential risk of intrusion assessed by a food safety professional or food safety personnel?	
Pages 46-47, Table 5	FS 03h - Was the animal hazard or potential risk of intrusion assessed as a "Low Hazard"?	
rages 40-47, Table 5	FS 03h1 - If "YES" were corrective actions carried out according to company SOP?	
	FS 03i - Was the animal hazard or potential risk of intrusion assessed as a "Medium/High Hazard"?	
	FS 03i1 - If "YES" were corrective actions carried out per the LGMA requirements"	
	FS 03i2 - If "YES" is documentation available to show that actions were implemented"	
	FS 03j - Is there an SSOP of harvest equipment that addresses the following:	
Page 36, Lines 698-700	FS 03k - Frequency of cleaning and sanitation	
Page 37, Line 745	FS 03I - Chemical usage and record keeping	
Page 36, Lines 695-697	FS 03m - Equipment-specific cleaning instructions	
Page 36, Lines 681-682	FS 03n - Chemical storage	
r age 50, Lines 001-002	FS 03o - Appropriate labeling of chemical storage containers.	
Page 35, Line 663	FS 03p - Sanitation verification	
Page 35, Line 664	FS 03q - Daily inspection	
	FS 03r - Question deleted per LGMA Board action on 07/10/2009	
Page 35, Lines 670-67	FS 03s - Is there an SOP for handling and storage of product containers that addresses the following:	
Page 35, Line 672	FS 03t - Overnight storage	
Page 35, Line 673	FS 03u - Contact with the ground	
Page 35, Line 674	FS 03v - Container assembly (RPC, fiber bin, plastic bin, etc)	
Page 35, Line 675	FS 03w - Damaged containers	
Page 35, Line 676	FS 03x - Use of containers only as intended	
Page 35, Line 677	FS 03y - Is there an SOP for sanitary operation of equipment that addresses the following:	
Page 35, Line 678	FS 03z - Spills and leaks	
	FS 03za - Harvest equipment protection	
Page 36, Lines 703-712	FS 03zb - Overnight equipment storage	
	FS 03zc - As per the SOP for Sanitary Operation of Equipment, were the appropriate remedial actions taken as necessary?	
Page 46, Table 5	FS 04 - Is there a written SOP which addresses corrective actions for "Low Hazard" animal intrustion?	



	Field Observation	
Page & Line #s	Question	Co
Water Use		
Water Ose	FO 01 - Are all active and inactive water sources recorded in the Water Use Audit?	
	FO 01a - From visual inspection, there is no evidence that the water sources and distribution systems may pose a contamination	
	risk (damage, inadequately maintained, evidence of animal activity, connection with effluent systems)?	
	FO 01b - No other observations of improper use of water	
Soil Amendments		
	FO 02 - No evidence of undocumented use of soil amendments?	
	FO 02a - No evidence of improperly applied soil amendments?	
	FO 02b - No evidence of improperly stored soil amendments?	
	FO 02c - No other observations of improper use of soil amendments	
Environmental Facto	ors	
	FO 03 - No evidence of fecal contamination in the field?	
	FO 03a - No evidence of animals hazards in the field?	
	FO 03b - No evidence of non-compliance with distances as outlined in the Environmental Assessment?	
	FO 03c - No evidence that remedial actions such as animal barriers (fences, gates, grates, etc) are not in good repair and operational?	
	FO 03d - No evidence that worker hygiene rules have been violated during the crop cycle?	
	FO 03e - No other observations of environmental risk factors.	
Worker Practices		
	FO 04 - No employees eating, drinking (except water), chewing tobacco or smoking in crop production actively harvested areas?	
	FO 04a - All employees observed to have washed their hands after; restroom usage, work breaks, or any returning to work occasion?	
	FO 04b - No evidence that sanitary facilities are not routinely clean and operational?	
	FO 04c - No evidence that worker hygiene rules have been violated during the crop cycle?	
	FO 04d - No evidence that sanitary facilities are not adequately stocked with disposable supplies?	
	FO 04e - No improperly stored personal items observed in the field?	
	FO 04f - No evidence or observations that employees are not using the restrooms?	
	FO 04g - No employees with uncovered wounds, boils or cuts?	
	FO 04h - No employees with symptoms of infection or contagious disease?	
	FO 04i - No other observations of improper work practices.	



Field Observation (continued)		
Page & Line #s	Question	Com
Field Sanitation		
	FO 05 - No evidence of excessive non-vegetative debris in the field?	
Ì	FO 05a - No evidence of open and/or unsupervised chemicals in the field?	
	FO 05b - No evidence of leaks and spills on equipment in the field?	
	FO 05c - No evidence of the use of non-sanitized farm equipment that may have come in contact with raw manure, untreated compost, waters of unknown quality, wildlife or domestic animals?	
	FO 05d - No evidence of other cross-contamination potential of product and/or product contact surfaces?	
Ì	FO 05e - No other evidence of improper field sanitation.	
	Soil Fertility	
Page 51, Lines 995-99	9 SF 01: Have all production blocks intended for spinach been evaluated for the presence of Cadmium?	
Page 51, Lines 1000- 1007	SF 02: Has a soil fertility program been developed?	